

the community advertisers are especially interested in.

4. Local Television News Should Not Be Considered a Substitute for Local Public Affairs Programming.

The apparent low level of attention to important local issues through public affairs programming is not increased by the local news programs. While current news programming may be more entertaining than ever, it clearly does not satisfy the goal of local discussion about important local issues. A Kaiser Family Foundation/Center for Media and Public Affairs Report shows that crime and accidents make up roughly 30 percent of local newscasts, while reporting on local city or state government was only two (2) percent combined. Sports and entertainment combined for ten percent.⁵¹ These findings are in line with the comments of Professor Xandra Kayden, Chapter President of the League of Women Voters in Los Angeles; “If 70 percent of Americans get their news from television — and local television is devoted to personal tragedies, natural disasters and consumer news — it is not difficult to explain the decline in affiliation with our political system.” Professor Kayden cites as evidence the LWV study of local news, “Media Watch.” Alicia Maldonado of the Mexican American Legal Defense and Education Fund writes:

coverage of local primary races, controversy over the building and construction of schools in Los Angeles, and meetings of local government were missing, yet these issues directly affect the daily lives of television viewers. I was frankly surprised that not one story covered the activities of the city council or board of supervisors.⁵²

These reactions reflect local news coverage in every region of the country. Digital broadcasters should not be allowed to skirt their obligation to provide information and discussion of local

⁵¹ Assessing Local Television News Coverage of Health Issues, Kaiser Family Foundation/Center for Media and Public Affairs Report, 1998.

⁵² See Appendix at D-5a for both the Kayden and Maldonado letters.

issues by pointing to their news/entertainment programs.

B. Digital Broadcasters Should Provide One Public Service Announcement for Every Four Commercials, With at Least Equal Emphasis Placed on Independent and Locally Produced PSAs Addressing a Community's Local Needs.

Public service announcements are an important means of providing reminders about local public events and simple messages about non-commercial activity in the community. These announcements can improve, and make civil our local discussions. Unfortunately, there seems to have been a decline in local and non-promotional public service announcements. Gail Parson, a Consumer Associate with Illinois Public Interest Research Group, writes: "Public service announcements are a way for stations to give back to the community in which they broadcast. If public service announcements are aired at all, they are aired when most viewers are asleep."⁵³

According to Susan Grover of the Prevention Coalition of Southeast, Michigan (PREVCO)

Over the past years we have seen a dramatic decrease in the actual amount of airtime that is devoted to PSA's. In the past, we were able to consecutively air :60 spots. Currently, we are confined to :30 or :15 spots. The seriousness of these community health issues has not decreased. Unfortunately, the available airtime has decreased by up to 50%.⁵⁴

Therefore, we recommend that digital broadcasters be required to provide one public service announcement for every four commercials, with at least equal emphasis placed on independent and locally produced PSAs addressing a community's local needs. PSAs should run in all day parts including in primetime and at other times of peak viewing.

As the Commission understands all too well, the U.S. regulation of broadcasting is based

⁵³ See Appendix at D-3a.

⁵⁴ See Appendix at D-3b.

upon offering private citizens free and exclusive license to use a locally defined portion of the electromagnetic spectrum, in exchange for their using this public property on behalf of the local public. This obligation does not mean donations to local charities, it means local television programs serving the needs of the entire community. This deal, a free license for local public service, is a fiction and a fraud, just one more example of corporate welfare, if the Commission shrinks from the obligation to set certain and enforceable guidelines for public discussion.

C. The Commission Should Require Broadcasters to Seek Out the Needs and Interests of All Segments of the Community of License.

As stated above, the FCC determined in the mid-1980's that the obligations of a public licensee to serve the public good could be easily substituted by the dictates of the commercial marketplace. According to that FCC, requiring broadcasters to determine the issues of importance to all segments of its community of license proved to be burdensome, inconvenient to both business and government, and unnecessary given marketplace pressures to discover consumer needs. We will address the last platitude first, and argue second that new technologies make ascertainment duties no longer (putting aside the question of whether they ever really were) unduly burdensome or inconvenient.

1. The Market Does Not Guarantee that All Segments of the Community Will Be Served.

In arguing against the ascertainment requirement, Commissioner Furchtgott-Roth writes: "Broadcasters have every reason to serve their local communities and, if they do not meet that

challenge, they will go out of business.”⁵⁵ This old reasoning is not only bad logic it ignores reality. Ascertainment requirements were put in place in the late 1960's and early 1970's because it was demonstrated that certain broadcasters ignored the needs of certain segments of their community, particularly ethnic and racial minorities. To paraphrase the *Kerner Commission Report*, for four decades the market failed to ensure that all broadcast licensees communicated to white America what it meant to be other than white. The broadcast market did not, does not, and will not dictate that all segments of the community of license be “served.” The broadcast market dictates meeting the short-term desires of its potential paying customers. Those customers, of course, are advertisers. Advertisers, and the broadcasters who serve them, may determine, as they have in the past (rightly or wrongly), that ignoring certain minority groups, or women, or the elderly, or the disabled, may be the most efficient market action.⁵⁶ Thus, broadcasters certainly need not go out of business if they ignore the needs of certain groups. Indeed, broadcasters may see ignoring those needs as protecting their ability to best serve both their core customers and the audience that those advertisers seek. However efficient it may be to ignore the needs of certain groups, it is certainly not in the best interests of either the community segment or the community at large. Community needs and interests cannot intelligently be confused with short term market dictates.⁵⁷

The Commissioner’s logic fails to understand the broadcast market, and it fails to observe

⁵⁵ See NOI, Separate Statement of Commissioner Harold Furchtgott-Roth.

⁵⁶ See generally, Kofi Ofori, When Being One Is Not Enough, Civil Rights Forum on Communications Policy, 1999.

⁵⁷ Andrew Graham, Broadcasting Policy in the Digital Age, Evidence to the Advisory Committee on Public Interest Obligations of Digital Television Broadcasters (Submitted to the Public Interest Advisory Committee), July 1998, at 10-15.

the facts. Not only do the national networks regularly decide that it is in their market interest to ignore certain communities, broadcasters across the country ignore a variety of groups in their community of license. Allen Perez, of Cambridge, Massachusetts writes: “Most of the major local stations do not even have a community liaison . . . An evening of watching my local broadcast station reveals . . . Not a single mention of Latino issues.”⁵⁸ Minority groups are not the only ones ill-served by market dictates. New York NOW member Sonia Ossorio writes, NOW/NYC “won a court case against the New York State division of human rights to force them to set up policies to improve response time and lower the backlog of employment discrimination suits filed with the state. [Not] CBS, nor Fox, nor any other television station responded to press announcements of this legal victory won by NOW.”⁵⁹ The public good and the results of unregulated markets (so-called) are not one and the same.

2. New Technologies Can Relieve the Administrative Burden of Discovering Community Needs.

We are left with the rather weak argument that broadcasters consider community consultations too much of a burden. Now, new technologies have been developed which might help relieve the supposedly burdensome nature of determining the public interest.

On-line discussions, perhaps once a quarter, with a diverse selection of community leaders can be conducted by the station. These discussions can be stored automatically and kept available on-line for the general public to read. Programs are already available which facilitate these sort of discussions. These programs can rank ideas listed by participants and calculate

⁵⁸ See Appendix at D-1a.

⁵⁹ See Appendix at D-1b.

percentages. A good example on how local television stations might consult with community leaders on issues important to a variety of segments of the community is the Benton Foundation's Debate America project. This project "maps community issues, provides context, and facilitates discussion," through an Internet Web-based program. Discussion leaders can select participants or allow for a wide field of discussants, and allow for a wide range of discussion styles. Imagine a community relations director at a local television station with this tool to consult with a wide range of community leaders from time to time on important local issues.⁶⁰ No more messy paperwork, or burdensome aggregation of comments. We propose requiring the broadcasters to conduct community consultation via Internet technologies.⁶¹

D. Digital Broadcasters Should Be Required to Disclose their Public Interest Programming and Activities Quarterly.

The best guarantor that broadcasters attend to community needs is community oversight. People for Better TV applauds the Commission's insistence upon requiring the requirement that broadcasters make their quarterly reports and other important documents available to the public. These requirements should be extended to digital community service

We must report, however, a decidedly mixed reception from our coalition who attempted to review public files. Rick Loza of t

Debate America

⁶⁰ See Debate America (visited Mar. 20, 2000) <<http://www.debateamerica.com>>. Lotus has developed a wide range of software programs which allow for information exchange. (Mar. 20, 2000) <<http://www.lotus.com/home.nsf/welcome/products>>.

⁶¹ We recognize that the Internet is not accessible to everyone. However, we think that an Internet-based solution is a reasonable compromise that minimizes broadcasters' burdens while providing a means for community interaction.

International Union, Local 46, writes that he and a colleague went to inspect the public files at a Chicago station, and were told that they “could not see anyone without an appointment.” After asking to call someone to set up an appointment, he was refused both a telephone and a telephone number.⁶² Dorothy Garrick of Columbia, South Carolina writes:

On March 7, 2000 I visited one of my local broadcasting station, SCETV in Columbia, South Carolina to inspect the public files and was not allowed to see the files. These are some of the reasons I was given by Ms. Kathy Gardner-Jones, Vice President- SCETV as to why I could not inspect the public files: I needed to file a Freedom of Information request, unless I explained exactly what I was looking for in the public files. (She assumed I did not know what Freedom of Information meant, so she proceeded to explain it to me and how to file). I needed to tell her exactly what I was looking for in the public files. I could not see the employees personnel files. Public files are not in one (1) location. I needed to go to different areas in the building to inspect the public files. Staff is very busy and don't have a lot of time. Staff needed to know exactly how much time I would need to inspect the public files. A staff member had death in his family. I needed to make an appointment to see the public files.⁶³

Catherine Bell of the Boston Chapter of NOW writes, “we were told we would not be able to view the public files that day.”⁶⁴ Shirley Middleton of New York writes, “I went to NBC and ABC with my daughter to gain entry to the public records and I cannot believe the run around they tried to give me.”⁶⁵

While we continue to think it important for stations to keep files for public review on site, we propose that digital broadcasters also be required to disclose information on their web sites. This policy would be a minor burden on the stations compared to the incredible burden on those

⁶² See Appendix at D-3a.

⁶³ See Appendix at D-2b.

⁶⁴ See Appendix at D-1a.

⁶⁵ See Appendix at D-1b.

members of the public who travel several miles only to be turned away or made to feel uncomfortable. As Mary Ellen Guest, of Working In The Schools from Chicago says,

It is time-consuming and expensive (downtown parking is \$14 per hour) to visit local broadcast affiliates and review their public files. We encourage the FCC to require stations to post reports about their children's programming, public service announcements, and public affairs programming on the Internet.⁶⁶

This recommendation is a small step and it should be implemented immediately. Research by the National Association of Broadcasters in 1998 revealed that approximately two-thirds of television stations in the top 100 markets had web sites.⁶⁷

The Commission asks what information should be included in the public files of digital broadcasters?⁶⁸ In addition to the current requirements, broadcasters should put in their files and their web sites all records of community consultations, and the means by which the station makes its programs available to the disabled. One persistent complaint from People for Better TV members is that it was difficult to gauge what public service announcements were broadcast. We concur with the recommendation of Benjamin Jones, of the National Council on Alcoholism and Drug Dependence in Detroit, who suggests that digital broadcasters "list in their public file the date, time and type of public service announcements they air."⁶⁹

To facilitate broadcaster compliance and public review, the Commission should create a public service form that is both easy to complete and easy to read. Standard, computerized forms

⁶⁶ See Appendix at D-3a.

⁶⁷ See Brian Savoie, Summary of Web Activity of Television Stations (visited Jan. 26, 2000) <<http://www.nab.org/Research/webbriefs/WebActiv.html>>

⁶⁸ NOI at ¶16.

⁶⁹ See Appendix D-3b.

listing employment, public service programs, etc, should be administratively simple, much simpler than the standard commercial logs station administrative support complete every day. As indicated above, several members of People for Better TV reviewed public files at stations across the country and the most consistent finding is the lack of consistency and uniformity about what is in the files, even within the same community. Chicago Commissioner Shiela Lyne attached a summary of visits to television stations which notes:

At three out of five stations, all mail was placed together, no matter what the topic was. At two stations, there were specific “violence files” and one station, WBN which was visited first, kept violence files separate, stating they were mandated to do so by the FCC. No other station had known about that mandate.

Professor Rose Economou of Columbia College in Chicago assigned her class to monitor local stations, write a letter to each station about what they saw, and visit the station to inspect the public file to see, among other things, if the letters they wrote were placed in the file. Only one letter was found at one Chicago station - WPWR-TV, none of the other stations had the student letters on file. Several letters from her class are attached. As Professor Economou reports: “the state of the ‘public file’ is in jeopardy.”⁷⁰

People for Better TV recommends that public files be kept current; letters and e-mail received should be placed in the file no later than five (5) days after receipt. Members of the public may be interested to know whether there is a shared sentiment regarding a recent community issue or action by the station. Allowing a station to wait until an issue or station action has perhaps become moot (or until after an FCC inspection) before a letter is placed in the

⁷⁰ See Appendix at D-3a for both Commissioner Lyne’s letter and the letters from Professor Economou and her class.

file does not further the core goal of the public file obligation.

Digital television broadcasters should be required to respond to community needs with local programming services. In order to provide responsive programs, broadcasters should be required to consult with all the segments of the community they are licensed to serve. And, at a minimum, the public files should be current and the public should have much easier access to the information the broadcasters are required to keep. If ascertainments and public reporting were burdensome fifteen years ago, new information sharing technologies have made these requirements far less burdensome. Unless this Commission is prepared to declare the public interest standard a promise which cannot be kept, People for Better TV asserts that the basic triangle of this standard be preserved in the digital age: ascertaining community needs, providing programs which address those needs, and reporting to the community what service is being provided should be considered minimum public interest requirements.

IV. Enhancing Access to the Media

A. The Commission Should Ensure that Digital Broadcasting is Accessible to All Americans.

The Commission should adopt regulations for closed captioning and video description that ensure that all disabled individuals have access to digital television. People for Better TV has attached a letter signed by 23 groups representing deaf and hard of hearing people which sets forth our position that, “broadcasters who are now entering the digital age should be required to take advantage of increased bandwidth as well as other emerging features of digital technologies

that can serve to enhance access to digital TV” for all Americans.⁷¹

On behalf of these 23 groups and other viewers with disabilities, People for Better TV offers several specific proposals. We maintain that the Commission should adopt captioning rules that: 1) enable viewers to control caption styles and permit decoding and processing of different captioning services; 2) require captioning of PSAs, public affairs programming and political discourse; and 3) require real-time captioning of newscasts, and televised information about disasters. These requirements could be phased in over the first four years of a station’s digital broadcast, but should be completed by 2006. In addition, the Commission should adopt rules governing video description that: 1) require broadcasters to allocate sufficient audio bandwidth for the transmission and delivery of video description; 2) require that all digital television receivers support simultaneous multi-channel audio-decoding capability so that descriptions can be delivered separately from a program’s main audio; 3) establish a schedule for digital broadcasters to begin providing video description for their programming.

Implementing these provisions would fulfill Congressional mandates, and would not unduly burden broadcasters. In Section 305 of the 1996 Act, Congress stated that television and cable programming should be accessible through closed captioning. 47 U.S.C. § 613. Similarly, the Television Decoder Circuitry Act requires that new television technologies be capable of transmitting closed captions.⁷² The expense for digital broadcasters of complying with these provisions should be minimal. Captioning costs are expected to drop as demand increases and captioning technology improves. Furthermore, digital technology offers multiple audio channels

⁷¹ See Appendix at C-4.

⁷² See Pub. L. 101-431, 104 Stat. 960 (1990) (codified at 47 U.S.C. §303).

with significantly greater bandwidth that can easily and inexpensively accommodate video descriptions. Thus, the Commission must adopt each of these recommendations to ensure that the benefits of digital television are available to all.

The Commission should also ensure that disabled individuals have access to ancillary and supplementary services. Such a policy would be consistent with Section 255 of the Telecommunications Act of 1996 which requires providers of telecommunication services to make these services “accessible to and usable by individuals with disabilities, if readily achievable.”⁷³ The FCC should work with other regulatory agencies and set manufacturers so “that modifications in audio channels, decoders, and other technical areas [are] built to ensure the most efficient, inexpensive and innovative capabilities for disability access.”⁷⁴ Moreover, the Commission should not allow broadcasters to implement ancillary and supplementary services in a way that would impinge on bandwidth set aside for captioning or video descriptions. Individuals with disabilities should have every opportunity to enjoy the benefits of the development of digital television.

People for Better TV has found that individual viewers with disabilities are concerned about their ability to access digital television services. As Julia Zozaya, a blind and hearing impaired woman from Phoenix, writes in her attached letter, only the public broadcasting station in her area offers video description. She writes, “[t]his means that I cannot enjoy the local news, weather, or any of the community or public affairs programming which are offered by the other stations.” Ms. Zozaya also writes that she “wants to be sure that the [digital television]

⁷³ 47 U.S.C. § 255(c).

⁷⁴ See Appendix C-4, NAD Letter at p. 6.

technology, including both software and hardware will be standardized and accessible to all.”⁷⁵ Only by requiring digital broadcasters to provide equal access to digital television, including public affairs, political programming and PSAs, will the Commission be certain that all Americans can participate equally in the democratic process.

B. Diversity

1. DTV Broadcasters Should Be Required to Comply with the FCC’s EEO Rules.

People for Better TV urges the Commission, largely through its aforementioned recommendations, to make certain that digital broadcasters use this new medium to serve all members of their communities of license. Moreover, we applaud the Commission for moving forward with the establishment of sensible Equal Employment Opportunity rules, and are certain that these new rules will fully apply to digital broadcasters. In addition, we encourage the Commission to require broadcasters to announce all the station’s job opportunities, and report all diversity efforts, whether programming or employment, in the station’s public files and on its web site.

2. Under the People for Better TV Flexibility Approach Multicasting Broadcasters Could Devote Channel Space to Underserved Audiences.

The Commission seeks “comment on innovative ways unique to DTV that the Commission could use to encourage diversity in the digital era.”⁷⁶ People for Better TV recommends that, in consultation with their local communities, digital broadcasters who multiplex could be provided incentives, such as an abeyance of other public interest obligations,

⁷⁵ See Appendix at D-4b.

⁷⁶ NOI at ¶33.

to devote channel space to women, minorities, and other under served groups. These groups could use this channel space for datacasting, or commercial or non-commercial programming. As the League of United Latin American Citizens suggests: “Digital television broadcasters have the ability to send much more information, and more channels than standard analog broadcasts. Why not use that ability to provide more service to a more diverse audience? Why not use that ability to put on programs about the local needs and interests of minority communities at a time when those programs can be seen?”⁷⁷

3. Disaster Relief Information Should be Available in Multiple Languages.

People for Better TV also supports LULAC’s suggestion that all broadcasters be required to:

make emergency and disaster related information available in a variety of languages appropriate to the communities they are licensed to serve. While English may not be the dominant language, for many immigrants, English-language television is the only source of news, weather, and emergency information. We believe that broadcasters could reasonably be required to scroll emergency information across the bottom of television screens which would help to alert non-English speakers of life-saving instructions.⁷⁸

These efforts would go a long way toward ensuring that all Americans benefit from the new digital television service.

⁷⁷ See Appendix at C-3.

⁷⁸ Id.

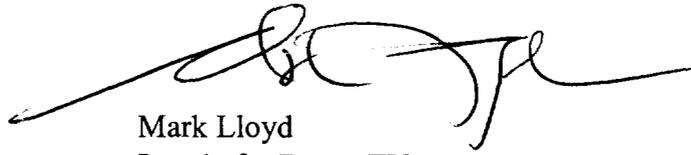
V. Conclusion

Most Americans do not know that their local broadcasters are given free licenses by the federal government to operate in the public interest of the local communities. The letters attached to this Comment attest to the general anger expressed by millions of Americans about the lack or quality of coverage of important local issues, or programs for children, or service to the disabled. People for Better TV has encouraged citizens across the country to read the Commission's documents on the relationship between broadcasters and the public. Citizens have visited stations and monitored local programming. And they have submitted comments about what they think it means for local broadcasters to operate in the public interest. We trust that this Commission will not be blind to the concerns expressed in those petitions, and will work to restore the public interest standard so the public might recognize that it is in operation.

There are many important philosophical arguments about the scarcity rationale, or the role of regulation in a period of technological transition, or the degree to which regulators should rely upon the marketplace. However, Congress tied the free licensing of spectrum to broadcasters on the condition that they operate in the public interest. This Commission is obligated to say what that means, and set clear public interest guidelines for digital broadcasters.

We commend the Commission for opening this Inquiry, and hope that it will stay open to resolve those remaining difficult technical issues surrounding this evolving technology. We also repeat the request we set out in June 1999: the time for a rule making proceeding on the public interest obligations of digital broadcasters is overdue. Federal licensees obligated to operate in the public interest should understand their obligations, so should the public.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'Mark Lloyd', written over a horizontal line.

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March 27, 2000

APPENDIX

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People for Better TV

Members
3/30/2000

Steering Group

Children Now
Civil Rights Forum on Communications Policy
Communications Workers of America
Consumer Federation of America
League of United Latin American Citizens
National Association of the Deaf
National Organization for Women
National Urban League
Project on Media Ownership
U.S. Catholic Conference

Other Coalition Members

American Academy of Child and Adolescent Psychiatry
American Academy of Pediatrics
American Documentary
American Foundation for the Blind
American Society for Deaf Children
A. Philip Randolph Institute
Appalshop
Arizona Consumers' Council
Association of Independent Video and Filmmakers
Benton Foundation
Branch County -NOW
Bridge the Gap - Family Day Care Network
Carolina Peace Resource Center
Center for Information, Technology, and Society
Chicago Access Corporation
Chicago Media Watch
Childserv
Christian Communication Council of Metropolitan Detroit Churches
Chinese for Affirmative Action
Citizens for Independent Public Broadcasting
Citizens' Media Corps
Cobb County -NOW
Columbia Consumer Education Council

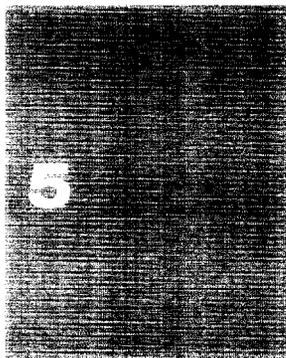
Community Technology Center's Network
Conference of Educational Administrators of Schools and Programs for the Deaf
Consumer Action
Cultural Environment Movement
Deaf Entertainment Foundation
Fairness and Accuracy in Reporting
Globalvision
Global Ministries United Methodist Church
Green Party of Metro Detroit
Interfaith Broadcasting Commission
Harlem Consumer Education Council, Inc.
Houston-Media Source
Illinois Campaign for Political Reform
Illinois Public Interest Research Group
Internews
Internews Interactive
Kartemquin Films Ltd.
Labor Council for Latin American Advancement
Latino Public Broadcasting
League of Women Voters - Los Angeles
Libraries for the Future
Loka Institute
LULAC-Houston District
MADD-Wayne County Michigan Chapter
Massachusetts Consumer's Coalition
Media Education Foundation
Mediascope
Metropolitan Christian Council: Detroit-Windsor
Mexican American Legal Defense and Educational Fund (MALDEF)
Michigan Association of Retired School Personnel
Michigan Consumer Federation
Michigan Institute for Nonviolence Education
MultiCultural Collaborative
NAACP
National Institute on Media and the Family
National Association of the Deaf
National Association of Latino Elected Officials (NALEO)
National Capital Area Trade Union Retirees
National Council of Churches
National Council on Alcoholism and Drug Dependence, Greater Detroit Area
National Hook-Up of Black Women, Inc
National Indian Telecommunications Institute
National Puerto Rican Coalition
NOW-Boston
NOW-California Action Center

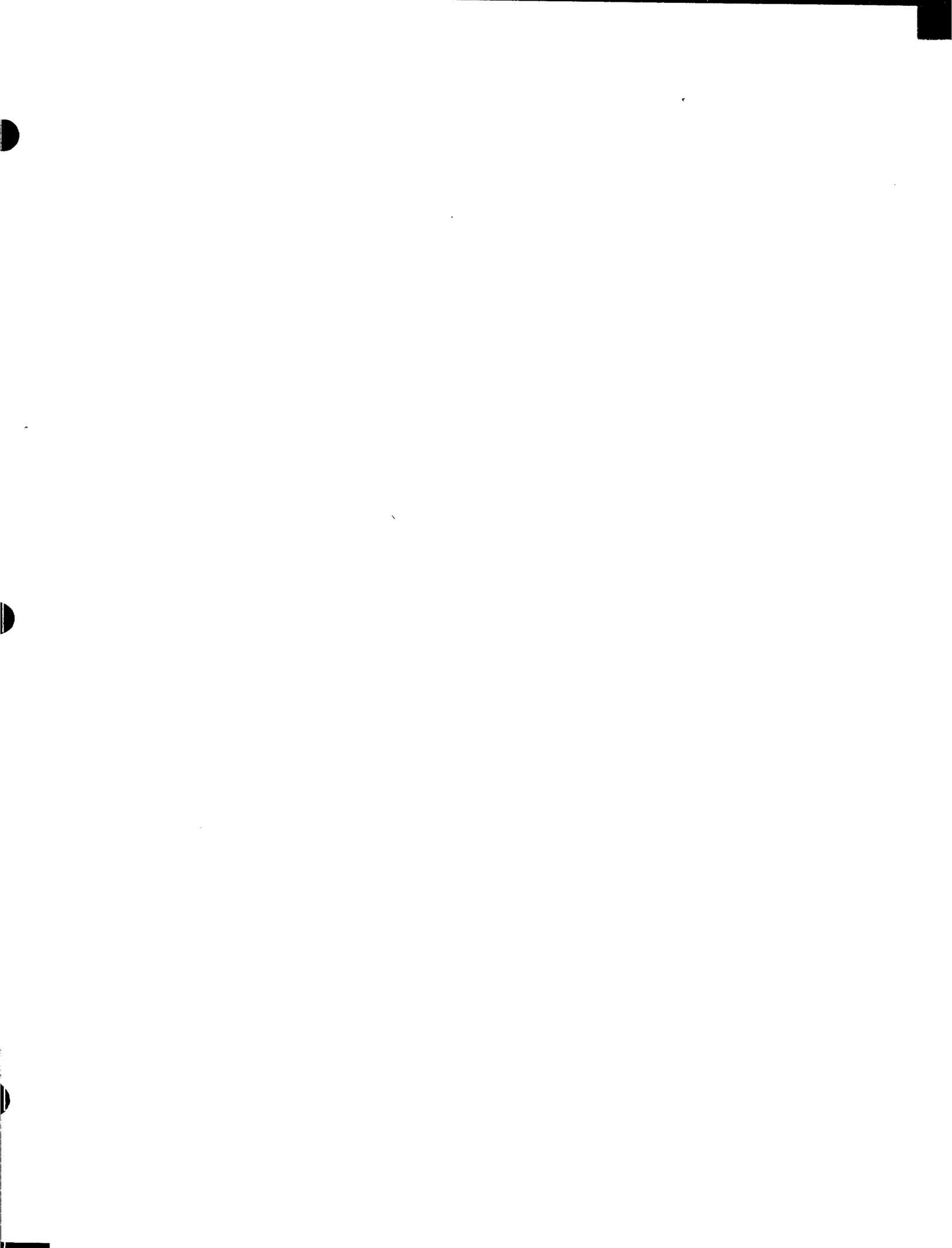
NOW - Montgomery County
NOW-New York City
NOW-Western Wayne County Chapter
NOW-University of Michigan Campus Group
New California Media
Nuestra Palabra: Latino Writers Having Their Say
OMB Watch
Pacific News Service
Pontiac Area Urban League
Prevention Coalition of Southeast Michigan (PREVCO)
Rocky Mountain Media Watch
Self Help for Hard of Hearing People
Service Employees International Union - Local 46
Southern Rural Development Initiative
Talenton Bilingue de Houston
Telecommunications for the Deaf, Inc.
Women's Institute for Freedom of the Press
Working In The Schools
WWNews
Youth Connection

Market Conditions and
Public Affairs Programming:
Implications for Digital Television Policy,
Philip Napoli, Ph.D.,
Benton Foundation, March 2000

A Methodological Evaluation of
the NAB report entitled:
"A National Report on the Broadcast
Industry's Community Service",
Project on Media Ownership, January 2000

Lake Snell Perry & Associates,
Findings from a National Survey,
People for Better TV &
Project on Media Ownership,
May 1999





Market Conditions and Public Affairs Programming: Implications for Digital Television Policy

A report prepared for



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